

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO**

In re: : Case No. 14-57104
:
John Joseph Louis Johnson, III, : Chapter 11
:
Debtor and Debtor in Possession. : Judge John E. Hoffman, Jr.

OBJECTING CREDITORS NOTICE OF DEPOSITIONS

Rodney Blum, through counsel, for himself and Capital Financial Holdings, LLC, Capital Holdings Enterprises, LLC, Cobalt Sports Capital, LLC, EOT Advisors, Inc., ProPlayer Funding, LLC, and RFF Family Partnership, LP (collectively, the “Objecting Creditors”), pursuant to Fed. R. Civ. P. 30, as incorporated into Fed. R. Bankr. P. 7030, hereby give notice that they shall examine the following persons under oath, at the following times and locations:

NAMES OF WITNESSES	DATES & TIMES	LOCATION
Kristina Johnson 2705 Lowell Road Ann Arbor, MI 48103	Monday, August 17, 2015 commencing at 10:00 a.m.	McDonald Hopkins PLC 39533 Woodward Ave. Suite 318 Bloomfield Hills, MI 48304
John Joseph Louis Johnson II 2705 Lowell Road Ann Arbor, MI 48103	Monday, August 17, 2015 commencing at 1:00 p.m.	McDonald Hopkins PLC 39533 Woodward Ave. Suite 318 Bloomfield Hills, MI 48304

The depositions are being conducted pursuant to Fed. R. Civ. P. 30, as incorporated in Fed. R. Bankr. P. 7030, and will be taken before a certified court reporter or some other notary public or officer authorized to record the testimony. The testimony will be recorded by

audiovisual and stenographic means. The depositions are being taken for the purpose of discovery, for use at trial, or for both, but in any event as related to the *Motion of Debtor and Debtor-in-Possession for an Order Converting Debtor's Chapter 11 Case to a Case under Chapter 7 and Granting Related Relief* [Doc. 167] filed March 5, 2015 by deponent John Joseph Louis Johnson, III, debtor and debtor in possession, and/or for such other purposes as are permitted under the Federal Rules of Bankruptcy Procedure and other applicable law, and shall continue from day to day until completed. Any objections must be filed prior to the taking of the deposition.

Respectfully submitted this 6th day of August, 2015.

Respectfully Submitted,

/s/ James H. Gordon
James H. Gordon (0017155)
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Counsel for Rodney Blum

CERTIFICATE OF SERVICE

I certify that on August 6, 2015, a true and correct copy of the foregoing *Objecting Creditors' Notice of Depositions* was served via electronic mail on these entities and individuals who are parties to this contested matter:

Pamela Arndt on behalf of U.S. Trustee Asst US Trustee (Col)
Pamela.D.Arndt@usdoj.gov

Paul J Battista on behalf of Creditor Capital Financial Holdings, LLC
pbattista@gjb-law.com

Daniel A DeMarco on behalf of Debtor In Possession John Joseph Louis Johnson, III
dademarco@hahnlaw.com, hlpcr@hahnlaw.com; cmbeitel@hahnlaw.com

Christian Donovan on behalf of Creditor Capital Holding Enterprises, LLC
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M Colette Gibbons on behalf of Creditor EOT Advisors, LLC
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Jeffrey Mark Levinson on behalf Creditor RFF Family Partnership, LP
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Craig W Relman on behalf of Creditor RFF Family Partnership, LP
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Marc J Kessler on behalf of Debtor In Possession John Joseph Louis Johnson, III
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Jennifer L Maffett-Nickelman on behalf of Creditor Pro Player Funding LLC
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Sean D Malloy on behalf of Creditor Capital Financial Holdings, LLC
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Kenneth M Richards on behalf of Creditor Capital Holding Enterprises, LLC
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Matthew G. Summers on behalf of Creditor Pro Player Funding LLC
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David M Whittaker on behalf of Creditor Cobalt Sports Capital LLC
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Christopher M. Winter on behalf of Creditor Pro Player Funding LLC
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John F Young on behalf of Creditor Cobalt Sports Capital LLC
jyoung@markuswilliams.com, jtokuoka@markuswilliams.com; docket@markuswilliams.com

/s/ James H. Gordon
James H. Gordon